

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

SATYAJIT SANYAL

*

Plaintiff

*

v.

*

Case No. 1:14-cv-00960-JCC-TCB

TOYOTA MOTOR NORTH AMERICA,
INC, et al.

*

*

Defendants

*

* * * * *

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants Toyota Motor Sales, U.S.A., Inc., Toyota Motor Manufacturing Kentucky, Inc. and Toyota Motor Engineering & Manufacturing North America, Inc. (collectively "Defendants"), by their attorneys, move pursuant to Fed. R. Civ. P. 56 for summary judgment in their favor on Plaintiff's claims against them because there is no genuine dispute between the parties as to any material fact regarding the claims, and Defendants are entitled to judgment as a

matter of law. The grounds for this motion are more particularly set out in the accompanying memorandum, which is incorporated herein by reference.

/s/ Joel A. Dewey

Joel A. Dewey

Virginia Bar # 37319

Paul J. Day (admitted *pro hac vice*)

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of May, 2015, copies of Defendants' Motion for Summary Judgment and Memorandum in Support thereof were served, first class postage prepaid, on:

Satyajit Sanyal
11654 Plaza America Drive, #622
Reston, Virginia 20190

Pro Se Plaintiff

/s/ Joel A. Dewey

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NOTICE PURSUANT TO LOCAL CIVIL RULE 7(K)

- (1) *Pro se* Plaintiff Satyajit Sanyal is entitled to file a response opposing Defendants' Motion For Summary Judgment and any such response must be filed within twenty-one (21) days of the date on which the motion is filed; and
- (2) The Court could dismiss the action on the basis of Defendants' papers if *pro se* Plaintiff Satyajit Sanyal does not file a response; and
- (3) *Pro se* Plaintiff Satyajit Sanyal must identify all facts stated by Defendants with which *pro se* Plaintiff Satyajit Sanyal disagrees and must set forth *pro se* Plaintiff Satyajit Sanyal's version of the facts by offering affidavits (written statements signed before a notary public and under oath) or by filing sworn statements (bearing a certificate that it is signed under penalty of perjury); and
- (4) *Pro se* Plaintiff Satyajit Sanyal is also entitled to file a legal brief in opposition to the one filed by Defendants.